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 20 STIHL Incorporated

21
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

22 JOSHUA C. EVANS, individually,
 23 Plaintiff,

24 vs.
 25 STIHL INCORPORATED, a Delaware
 26 corporation; DOES 1 through 25; ROE
 27 CORPORATIONS 1 through 25, inclusive,
 28 Defendants.

29 Case No.: 2:15-cv-02329-JAD-VCF

30
JOINT MOTION FOR EXTENSION OF
TIME TO SUBMIT ESI PROTOCOL
AND STIPULATED PROTECTIVE
ORDER

31
 Pursuant to this Court's January 23, 2016 Minutes [Dkt. No. 23], Defendant STIHL
 32 Incorporated, by and through its attorneys of record, Snell & Wilmer L.L.P., and Plaintiff Joshua C.
 33 Evans ("Plaintiff"), by and through his attorneys of record, hereby file this joint motion for a 14
 34 day extension of the February 25, 2016 deadline to file an Electronically Stored Information (ESI)
 35 protocol and stipulated protective order relating to certain confidential materials that the parties
 36 anticipate will be produced in this case. The parties submit this joint motion based on the
 37 following:
 38

1 The parties are working to develop and file an ESI protocol and stipulated protective
 2 order. On February 18, 2016, Plaintiff's counsel sent counsel for STIHL Incorporated an initial
 3 draft of the ESI protocol. Because of the detailed procedures involved in the ESI protocol, STIHL
 4 Incorporated needs additional time to review Plaintiff's initial draft and provide its suggested
 5 revisions. STIHL Incorporated is also presently drafting the stipulated protective order relating to
 6 certain confidential materials that the parties anticipate will be produced in this case for Plaintiff's
 7 counsel's review and comment. Accordingly, STIHL Incorporated anticipates that the parties will
 8 need an extension of the February 25, 2016 deadline to negotiate and finalize the terms of the
 9 stipulated protective order.

10 In light of the foregoing, STIHL Incorporated requested, and Plaintiff's counsel agreed to,
 11 a 14 day extension of the February 25, 2016 deadline to file an Electronically Stored Information
 12 (ESI) protocol and stipulated protective order. Therefore, the parties respectfully request an
 13 additional 14 days, up to and including March 10, 2016, to time to finalize and file an ESI
 14 protocol and stipulated protective order.

15 DATED this 23rd day of February, 2016.

16 SNELL & WILMER L.L.P.

17 Law Office of April N. Bonifatto

18 By: /s/ Morgan T. Petrelli
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25 By: /s/ April N. Bonifatto
 26 April N. Bonifatto
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39 Attorneys for Plaintiff
 40 JOSHUA C. EVANS

41 Attorneys for Defendant
 42 STIHL Incorporated

43 IT IS SO ORDERED.



44 **UNITED STATES MAGISTRATE JUDGE**
 45 DATED: 2-23-2016

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT ESI PROTOCOL AND STIPULATED PROTECTIVE ORDER** by the method indicated below:

<u>XXXXX</u>	Electronic Service (CM/ECF)	_____	Federal Express
_____	U.S. Mail	_____	U.S. Certified Mail
_____	Facsimile Transmission	_____	Hand Delivery
_____	Email Transmission	_____	Overnight Mail

and addressed to the following:

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DATED this 23rd day of February, 2016.

/s/ Tonya C. Stephenson
An Employee of Snell & Wilmer L.L.P.

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